

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ARAMARK HEALTHCARE SUPPORT SERVICES,

Plaintiff,

v.

WAUKEGAN ILLINOIS HOSPITAL COMPANY, LLC,  
d/b/a VISTA HEALTH SYSTEM,

Defendants.

Court No: 25-CV-06361

Judge Joan B. Gottschall

**DEFENDANT'S MOTION TO VACATE DEFAULT JUDGMENT  
PURSUANT TO RULE 60(b)**

Defendant, Waukegan Illinois Hospital Company, LLC, d/b/a Vista Health System, by and through its attorneys, Trivedi & Khan, P.C., for its Motion to Vacate Default Judgment Pursuant to Rule 60(b), states as follows

1. Plaintiff filed its Complaint and initiated this suit on June 6, 2025 (ECF No. 1).
2. On September 17, 2025, this Court entered a default judgment order in favor of Plaintiff, in the amount of \$5,955,679.65. (ECF No. 20).
3. On November 17, 2025, Defendant's counsel filed his appearance in this matter (ECF No. 23).
4. On November 21, 2025, Defendant filed its Motion to Set Aside Default Judgement, pursuant to FRCP 60(b)(1) (ECF No. 24).

5. On December 22, 2025, this Court denied Defendant's motion, without prejudice. (ECF No. 28)

6. In denying the order, the Court noted that Defendant had demonstrated good cause to set aside the default judgment, and that Defendant took quick action, but had not answered the question of whether it has an arguably meritorious defense. The Court allowed that Defendant could renew its motion, limiting itself to the existence of an arguably meritorious defense. *Id.*

7. Defendant concedes that a balance is due to Plaintiff pursuant to the contract at issue, but has reason to believe the balance due is significantly less than the \$4.8 million alleged in the Complaint (ECF No. 1, ¶¶ 19) and intends to dispute the amount alleged by the Plaintiff.

8. The interests of justice are served by setting aside the default judgment and allowing the parties to engage in reasonable discovery, including discovery regarding Plaintiff's damages and payments made by Defendant.

9. It would be inequitable to determine the outcome of a suit with such significant financial stakes on the basis of a default judgment, when there exists an opportunity to determine the outcome of the matter on its merits.

For the foregoing reasons, Defendant, Waukegan Illinois Hospital Company, LLC, d/b/a Vista Health System, respectfully requests this Court grant its motion, vacate all defaults and default judgments against it, allow Defendant to file pleadings responsive to Plaintiff's Complaint, and grant such further relief as is necessary and just.

**WAUKEGAN ILLINOIS HOSPITAL  
COMPANY, LLC, D/B/A VISTA HEALTH  
SYSTEM**

*s/ Zubair A. Khan*

By: One of its attorneys

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